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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH HERNANDEZ, JR.,

Defendant.

CASE NO. 1:07-CR-00079-JLT-SKO
1:21-CR-00251-ADA-BAM

**AMENDED STIPULATION TO CONTINUE
STATUS CONFERENCE; ORDER**

DATE: August 30, 2022
TIME: 2:00 p.m.
COURT: Hon. Stanley A. Boone

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on August 30, 2022.
2. By this stipulation, the government and defendant now move to continue the status conference until September 20, 2022.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for government was out of the office on sick leave when the status report was due to be filed with the Court.

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c) Counsel for government and defendant desire additional time to consult with probation, discuss case resolution, check with other courts regarding possible charges, and review the discovery.

d) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to and agrees to the continuance.

IT IS SO STIPULATED.

Dated: August 29, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ LAUREL J. MONTOYA
LAUREL J. MONTOYA
Assistant United States Attorney

Dated: August 29, 2022

/s/ DOUGLAS FOSTER
DOUGLAS FOSTER
Counsel for Defendant
JOSEPH HERNANDEZ, JR.

ORDER

IT IS SO ORDERED.

Dated: August 29, 2022


UNITED STATES MAGISTRATE JUDGE